

1:22 MJ 4166

AFFIDAVIT

I, MICHAEL ADAMS II, HAVING FIRST BEEN DULY SWORN ACCORDING TO LAW, DO HEREBY DEPOSE AND SAY:

1. I am a United States Postal Inspector and have been so employed since August 2015, presently assigned at Cleveland, Ohio. From August 2015 to October 2015, I attended the United States Postal Inspection Service Basic Training Academy where I have received training in the detection and investigation of prohibited mailing offenses. I have worked U.S. Postal Service-related investigations for approximately 7 years, during which time I have been the case agent for numerous drug investigations leading to prosecutions in U. S. District Court.
2. From April 2007 to August 2015, I was employed by the Lake County Narcotics Agency (LCNA) as a Special Agent. As an LCNA Special Agent, I was authorized to conduct investigations into alleged violations of Ohio State Drug Laws; specifically, I was trained and experienced in investigations of drug offenses as defined in Chapter 2925 of the Ohio Revised Code, undercover drug sale operations, and the manufacture of illegal controlled substances. I have applied for and executed numerous state search warrants leading to prosecutions within the state court system.
3. This affidavit is submitted in support of criminal complaint against Larrie Ladell Campbell, charging one count of Attempted Possession with Intent to Distribute 400 Grams or More of Fentanyl, in violation of 21 U.S.C. §§ 846 and 841(a)(1), (b)(1)(A)
4. Because this affidavit is submitted for the limited purpose of supporting a criminal complaint, I have not included each and every fact known concerning this investigation. I have set forth only the facts I believe necessary to establish probable cause that Larrie Ladell Campbell committed the offense charged in the complaint.
5. I know based upon my training and experience that the U.S. Mail is often used by narcotics traffickers to transport controlled substances. I further know that the Priority Mail and the Priority Mail Express system is commonly used to transport controlled substances because this system provides reliability, traceability, and timely delivery. Based on my training and experience, I am likewise aware that drug traffickers who use the U.S. Mail for the purpose of transporting controlled substances and/or drug proceeds often use fictitious, incomplete, or misspelled names and/or addresses on parcels to conceal their true identities from law enforcement.
6. On May 10, 2022, while conducted parcel interdiction at the Cleveland Processing and Distribution Center, 2400 Orange Ave, Cleveland, OH 44101, PI Adams identified the following parcel inbound to the Northern District of Ohio; USPS Priority Mail Express Parcel no. EI 365 122 837 US, addressed to Josephine

Jackson, 9360 Amesbury Ave, Cleveland, OH 44106, bearing a return address of James Jackson, 9360 Amesbury Ave, Cleveland, OH 44106 (herein referred to as Subject Parcel), as a suspected drug parcel based on several factors including but not limited to origin, method of mailing.

7. The Subject Parcel is described as a brown USPS Ready Post XXL Box, weighing approximately 25 pounds 4.0 ounce, and measuring 20" X 20" X 20". The Subject Parcel was mailed on May 10, 2022, from the Phoenix, AZ Post Office and bore \$356.30 in U.S. Postage.
8. On May 10, 2022, the Subject Parcel was individually placed into a lineup containing several blank parcels which emanated no narcotics odors. Narcotic detection canine "Ciga," handled by Detective Twombly, was allowed to examine the lineup. According to Detective Twombly, Ciga gave a positive alert on the Subject Parcel and none of the blank parcels, and PI Adams also witnessed the alert. According to Detective Twombly, the positive alert meant Ciga detected the odor of an illegal drug emanating from the Subject Parcel.
9. On May 10, 2022, PI Adams applied for and obtained a federal search warrant through the United States District Court for the Northern District of Ohio. The warrant was signed by the Honorable Jonathan D. Greenberg, U.S. Magistrate Judge. PI Adams executed federal search warrant 1:22MJ4158 and recovered approximately 2,745 grams of blue pressed tablets stamped M/30 suspected of containing Fentanyl. The tablets were concealed inside two small refrigerators. The blue M/30 pressed Tablets were immediately submitted to the Cuyahoga County Regional Forensic Science Laboratory (CCRFSL) for analysis.
10. On May 11, 2021, PI Adams received the CCRFSL report for the tablets, which confirmed that they contained fentanyl, a Schedule II controlled substance, with a total net weight of approximately 2,204.67 grams.
11. On May 11, 2022, PI Adams applied for and obtained a federal residential anticipatory search warrant through the United States District Court for the Northern District of Ohio. The warrant, 1:22MJ4164, was signed by the Honorable Jonathan D. Greenberg, U.S. Magistrate Judge, in preparation for an upcoming Controlled Delivery operation.

12. On May 11, 2022, USPIS and DEA conducted a Controlled Delivery operation of the Subject Parcel to 9360 Amesbury Ave, Cleveland, OH 44106, (Target Residence). Prior to the Controlled Delivery, Investigators removed all controlled substance from inside Subject Parcel and replaced the contents with sham. Investigators placed electronic devices inside the Subject Parcel that alerted when the Subject Parcel was opened and/or in motion, including a GPS (Global Positioning System) unit inside the Subject Parcel to indicate the Subject Parcel's geo-location.
13. At approximately 1050 hours, pre-delivery surveillance was established in the area of the Target Residence. At approximately 1103 hours, PI Senchesak, acting in an undercover capacity, arrived in the area and parked immediately in front of the Target Residence. At 1105 hours, PI Senchesak exited the USPS vehicle with the Subject Parcel in hand and approached the front door of the Target Residence. PI Senchesak knocked and rang the doorbell, but no one answered. PI Senchesak scanned the Subject Parcel delivered, placed the Subject Parcel in front of the door, and re-entered the USPS vehicle. At Approximately 1108 hours, PI Senchesak departed from the delivery location.
14. At approximately 1125 hours, a gold Lincoln MKZ arrived and began circling the area of 93rd Street and Hough Ave. The vehicle was registered to a Shakiyla Flowers of Cleveland, OH. The vehicle was driven by a black male, later identified as Larrie Campbell. Campbell parked the gold Lincoln MKZ in a parking lot behind the Target Residence. Surveillance units then observed Campbell repeatedly walk up and down the street and circle around the Target Residence while on foot. This activity is consistent with counter-surveillance, which individuals will often do before picking up a drug parcel.
15. Due to the layout of the area and other issues, investigators were not able to maintain constant surveillance on the front of the Target Residence after the Subject Parcel was delivered.
16. At approximately 1200 hours, investigators received an alert that the Target Parcel was in motion. Minutes later, investigators received another alert that the Subject Parcel had now been opened. All surveillance units converged on the Target Residence. At the same time, surveillance units observed Campbell walking out the rear sliding door of the Target Residence holding the contents of the Subject Parcel that contained the Sham (two small refrigerators). Campbell walked in the direction of the gold Lincoln MKZ. Investigators closed in on Campbell and yelled "police" and ordered Campbell to the ground. Campbell immediately dropped the items he was carrying and fled on foot from Investigators. Campbell was apprehended in the front yard of a nearby residence.
17. Investigators later recovered the external packaging of the Subject Parcel in a dumpster near the front of the Target Residence.
18. At 1205 hours, Investigators executed the federal anticipatory search warrant for the Target Residence. Investigators knocked and announced before making entry.

No one was inside the Target Residence. Investigators seized a plastic bag containing a quantity of suspected marijuana from the residence.

19. Investigators searched Campbell and found a blue Apple I-Phone 13 Pro Max and US Currency on his person. Campbell gave consent to search the Lincoln MKZ bearing Ohio license plate HOK1621. Investigators seized a loaded Taurus 40-caliber semiautomatic handgun (which Campbell claimed belonged to his significant other, who he said had a CCW permit), multiple bags containing a quantity of suspected marijuana, a plastic pill bottle containing a baggie of blue M30 tablets, and a baggie of unknown white powder.
20. Investigators later interviewed Campbell. After being advised of his Miranda rights, Campbell admitted to mailing the Subject Parcel to himself from Phoenix, AZ, and to knowing that the contents of the Subject Parcel were fentanyl pills.
21. Based upon the information contained in this affidavit, I submit there is probable cause to believe that on or about May 11, 2022, in the Northern District of Ohio, Larrie Ladell Campbell violated Title 21, United States Code, Sections 846 and 841(a)(1), (b)(1)(A) (Attempted Possession with Intent to Distribute 400 Grams or More of Fentanyl).



MICHAEL ADAMS II
U.S. POSTAL INSPECTOR

Sworn to via telephone after submission by
reliable electronic means on this day, May
12, 2022. Fed. R. Crim. P. 4.1, 41(d)(3).



JONATHAN D. GREENBERG
U.S. MAGISTRATE JUDGE

